Ms. Samantha Goodman
Modern Materials, Inc.
400 East 4th Street
Rochester, Indiana 46975

Re: 049-14544
Notice-only change to
MSOP 049-13642-00020

Dear Ms. Goodman:

Modern Materials, Inc., located at 435 State Road 25 North, Rochester, Indiana 46975 was issued a Minor Source Operating Permit (MSOP) on May 14, 2001 for an automotive coating operation. A letter notifying the Office of Air Quality of a permit change was received on June 14, 2001. The change will involve the following which qualifies as a notice-only change under 326 IAC 2-6.1-6(d) "modification of an existing unit that is of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 2-3". Therefore, the permit is hereby revised as follows (changes are bolded and deletions are struck-through for emphasis):

(a) One (1) CTO evaporator, designated as MM-27, which is permitted to evaporate the water from the aqueous lines to minimize liquid waste. The source proposes to use the CTO as a leftover paint and solvent combustor in addition to its current permitted operation.

The CTO will be in compliance with the PM limit of 0.5 pounds per one thousand (1,000 pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air). There are no new applicable requirements including the NSPS that will apply to the CTO when combusting leftover paint and solvents.

1. Section A.2 is revised to reflect the above change as follows:

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) through (p) No changes

(q) One (1) CTO evaporator, designated as MM-27, used to evaporate the water from the aqueous lines to minimize liquid waste, exhausting to a stack designated as Stack #20. **The source proposes to use the CTO as a leftover paint and solvent combustor in addition to its current permitted operation**. **The CTO has a maximum combustion capacity of 30 pounds per hour**.

2. Section D.2 facility description table is revised to reflect the change on the CTO as follows:

One (1) natural gas-fired boiler, designated as MM-1, with a maximum heat input capacity of 4.18 mmBtu/hr and exhausts to a stack designated as Stack #1.

One (1) natural gas-fired powder coat curing oven, designated as MM-2, with a maximum heat input capacity of 0.850 mmBtu/hr and exhausts to a stack designated as Stack #17.

Two (2) natural gas-fired powder coat curing ovens, designated as MM-3 and MM-4, with a maximum heat input capacity of 1.2 mmBtu/hr each and exhaust to stacks designated as Stack #18 and Stack #19.

One (1) natural gas-fired powder coat curing oven, designated as MM-5, with a maximum heat input capacity of 0.350 mmBtu/hr and exhausts to a stack designated as Stack #6.

Three (3) natural gas-fired powder coat curing ovens, designated as MM-6, MM-7, and MM-9, with a maximum heat input capacity of 0.5 mmBtu/hr each and exhaust to stacks designated as Stack #8, Stack #9, and Stack #12.

Two (2) natural gas-fired drying ovens, designated as MM-8 and MM-11, with a maximum heat input capacity of 0.5 mmBtu/hr each and exhaust to stacks designated as Stack #10 and Stack #15.

One (1) natural gas-fired flash-off oven, designated as MM-10, with a maximum heat input capacity of 0.50 mmBtu/hr and exhausts to a stack designated as Stack #13.

One (1) natural gas-fired heat cleaning burn-off oven, designated as MM-26, with a maximum heat input capacity of 2.0 mmBtu/hr, a maximum waste capacity of 55 pounds per hour and exhausts to the atmosphere.

One (1) CTO evaporator, designated as MM-27, used to evaporate the water from the aqueous lines to minimize liquid waste, exhausting to a stack designated as Stack #20. **The source proposes to use the CTO as a leftover paint and solvent combustor in addition to its current permitted operation**. **The CTO has a maximum combustion capacity of 30 pounds per hour**.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

3. Condition D.2.2 is revised to include the PM emission limit for the CTO when it combust leftover paint and solvents, and to specify existing emission units that are subject to this provision.

D.2.2 Particulate Matter (PM) [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), ~~all incinerators shall not~~ **the PM emissions from the following incinerators shall be limited as follows:**

(a) **The natural gas-fired heat cleaning burn-off oven, designated as MM-26** shall not emit in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000)

pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

(b) **The CTO, designated as MM-27, when use to combust leftover paint and solvent shall not emit in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.**

4. Condition D.2.3 is revised to include the CTO and to specify existing emission units that are subject to this provision.

D.2.3 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), ~~all incinerators~~ **the natural gas-fired heat cleaning burn-off oven, designated as MM-26**, **and the CTO, designated as MM-27 when use to combust leftover paint and solvent** shall:

(a) consist of primary and secondary chambers or the equivalent;

(b) be equipped with a primary burner unless burning wood products;

(c) comply with 326 IAC 5-1 and 326 IAC 2;

(d) be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) not create a nuisance or a fire hazard.

If any of the above in this condition, and an exceedance in the PM limits in condition D.2.2 result, the burning shall be terminated immediately.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File -Fulton County
U.S. EPA, Region V
Fulton County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Modern Materials, Inc.
435 State Road 25 North
Rochester, Indiana 46975

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 049-13642-00020	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 14, 2001
Notice-Only Change No.: 049-14544	Pages Affected: 5, 20, 21 Pages Added: 21a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 23, 2001

(i) Three (3) five-stage* zinc phosphate lines with a total approximate maximum capacity of 8,040 pounds per hour and exhaust to the atmosphere. One (1) five-stage* iron phosphate line with a total approximate maximum capacity of 8,040 pounds per hour and exhaust to the atmosphere.

* a standard five-stage line consists of the following stages: Alkaline wash, pressure Rinse, Phosphate, Pressure Rinse, Seal.

(j) One (1) natural gas-fired heat cleaning burn-off oven, designated as MM-26, with a maximum heat input capacity of 2.0 mmBtu/hr, a maximum waste capacity of 55 pounds per hour and exhausts to the atmosphere.

(k) One (1) hand solvent wash area, designated as MM-27 and exhausts to the atmosphere.

(l) Three (3) "Job Shop Line" HVLP paint booths, designated as MM-13 through MM-16, with a total maximum paint usage rate of 0.188 gallons per hour, particulate matter controlled by dry filters and exhaust to stacks designated as Stack #2 through Stack #5.

(m) One (1) "Regular Shaft Line" HVLP paint booth, designated as MM-12, with a maximum paint usage rate of 0.206 gallons per hour, particulate matter controlled by a dry filter and exhausts to a stack designated as Stack #16.

(n) One (1) "Flanged Shaft Line" HVLP paint booth, designated as MM-17, with a maximum paint usage rate of 0.342 gallons per hour, particulate matter controlled by a dry filter and exhausts to a stack designated as Stack #11.

(o) One (1) "Frame Line" HVLP paint booth, designated as MM-18, with a maximum paint usage rate of 1.00 gallons per hour, particulate matter controlled by a dry filter and exhausts to a stack designated as Stack #14.

(p) Three (3) powder coat booths, designated as MM-19 through MM-21, each containing an integral recirculation system consisting of a baghouse and exhausts internally.

(q) One (1) CTO evaporator, designated as MM-27, used to evaporate the water from the aqueous lines to minimize liquid waste, exhausting to a stack designated as Stack #20. The source proposes to use the CTO as a leftover paint and solvent combustor in addition to its current permitted operation. The CTO has a maximum combustion capacity of 30 pounds per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(a) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

One (1) natural gas-fired boiler, designated as MM-1, with a maximum heat input capacity of 4.18 mmBtu/hr and exhausts to a stack designated as Stack #1.

One (1) natural gas-fired powder coat curing oven, designated as MM-2, with a maximum heat input capacity of 0.850 mmBtu/hr and exhausts to a stack designated as Stack #17.

Two (2) natural gas-fired powder coat curing ovens, designated as MM-3 and MM-4, with a maximum heat input capacity of 1.2 mmBtu/hr each and exhaust to stacks designated as Stack #18 and Stack #19.

One (1) natural gas-fired powder coat curing oven, designated as MM-5, with a maximum heat input capacity of 0.350 mmBtu/hr and exhausts to a stack designated as Stack #6.

Three (3) natural gas-fired powder coat curing ovens, designated as MM-6, MM-7, and MM-9, with a maximum heat input capacity of 0.5 mmBtu/hr each and exhaust to stacks designated as Stack #8, Stack #9, and Stack #12.

Two (2) natural gas-fired drying ovens, designated as MM-8 and MM-11, with a maximum heat input capacity of 0.5 mmBtu/hr each and exhaust to stacks designated as Stack #10 and Stack #15.

One (1) natural gas-fired flash-off oven, designated as MM-10, with a maximum heat input capacity of 0.50 mmBtu/hr and exhausts to a stack designated as Stack #13.

One (1) natural gas-fired heat cleaning burn-off oven, designated as MM-26, with a maximum heat input capacity of 2.0 mmBtu/hr, a maximum waste capacity of 55 pounds per hour and exhausts to the atmosphere.

One (1) CTO evaporator, designated as MM-27, used to evaporate the water from the aqueous lines to minimize liquid waste, exhausting to a stack designated as Stack #20. The source proposes to use the CTO as a leftover paint and solvent combustor in addition to its current permitted operation. The CTO has a maximum combustion capacity of 30 pounds per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission limitations for sources of indirect heating), particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt \text{ ' } \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

(b) $Pt = 1.09/(4.184^{0.26}) = 0.75$ lb/mmBtu, but since Pt shall not exceed 0.6 lb/mmBtu, Pt is equal to 0.6 lb/mmBtu.

D.2.2 Particulate Matter (PM) [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), the PM emissions from the following incinerators shall be limited as follows:

(a) The natural gas-fired heat cleaning burn-off oven, designated as MM-26 shall not emit in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

(b) The CTO, designated as MM-27, when use to combust leftover paint and solvent shall not emit in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

Compliance Determination Requirements

D.2.3 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), the natural gas-fired heat cleaning burn-off oven, designated as MM-26, and the CTO, designated as MM-27 when use to combust leftover paint and solvent shall:

(a) consist of primary and secondary chambers or the equivalent;

(b) be equipped with a primary burner unless burning wood products;

(c) comply with 326 IAC 5-1 and 326 IAC 2;

(d) be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) not create a nuisance or a fire hazard.

If any of the above in this condition, and an exceedance in the PM limits in condition D.2.2 result, the burning shall be terminated immediately.

D.2.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test the emissions' units by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Conditions D.2.1 and 2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.